Greg Ferguson

RE: Coastal Flood Hazards

Please consider the following suggestions:

Include waves, stormwater, and small stream flood impacts to the lists of coastal flooding hazards. Waves are a very important hazard, they alter nearshore beach sand ecosystems, undermine bulkheads, erode bluffs, and damage buildings. As sea levels rise, local gravity flow stormwater systems and stream flows have nowhere to go and add to the flood hazard.

Add waves in these locations:
○ WAC 173-26-221 (2)(e)(iv)(A)(I) Frequently flooded areas. P105
○ WAC 173-26-221 (2) Critical areas (c)(vi)(B) Sea level rise zones (I) Description. P114
○ WAC 173-26-221 (4) (a) Sea level rise effects. P163
○ WAC 173-26-246 (4) Basic Concepts (g) Terms (ii) .P165
○ WAC 173-26-246 (6) Inventory of SLR Hazards (a)(i) Current hazards. P167
○ WAC 173-26-246 (6) Inventory of SLR Hazards (a)(ii) Future hazards. P167

Add stormwater and local stream flows in the above places and add the following to WAC 173-26-246 (6)(a): "Sea level rise hazard data not provided by the department must also be included in the inventory. Stormwater, small stream flow, and other conditions specific to local areas will increase flood risks as sea levels rise. This hazard data will not be supplied by the Department and will need to be addressed locally."

Also, add definition of "coastal flooding" in WAC 173-26-020 that includes all elements: groundwater rise, waves, static sea level rise, stormwater, river flows, and stream flows in the definition.

Sincerely,
Greg Ferguson
Sierra Club member